

Maysoun Fletcher, Esq.
Nevada Bar No. 10041
The Fletcher Firm, P.C.
5510 South Fort Apache Rd.
Las Vegas, Nevada 89148
Telephone: (702) 835-1542
Facsimile: (702) 835-1559
maf@fletcherfirmllaw.com
Attorney for Defendant,
Kaleb Louis

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,

vs.

CHANNING WILLIAMS, et. al.
Defendants.

CASE NO.: 2:17-cr-00180

FIRST STIPULATION TO CONTINUE TIME
FOR PRE-TRIAL MOTIONS

STIPULATION TO CONTINUE TIME FOR PRE-TRIAL MOTIONS

IT IS HEREBY STIPULATED AND AGREED by and between Frank Coumou, Assistant United States Attorney, counsel for the United States of America, Maysoun Fletcher, Esq., counsel for defendant KALEB LOUIS, Russell Marsh, Esq., counsel for defendant TREVAUGHN JAMES, Kathleen Bliss, counsel for defendant CASEY WALTERS, JR., Paola Armeni, counsel for defendant DENZEL CAMPBELL, Chris Rasmussen, counsel for defendant MAURICE LEWIS, Lucas Gaffney, counsel for DEMANI DANCY, Terrence Jackson, counsel for KEENAN ST. HILLAIRE, Joshua Tomsheck, counsel for KORREGAN WASHINGTON, Christopher Oram, counsel for EVERLY JAMES, Lance Maningo, counsel for defendant, DANIEL WILSON, Gabriel L. Grasso, counsel for defendant CHANNING WILLIAMS, Telia Williams, counsel for CODY WILLIAMS-JACKSON, David Fischer, counsel for DOMINIQUE WASHINGTON, and Jess Marchese, counsel for KEITH BELL, Michael Miceli, counsel for TREVIONNE WILLIAMS that the Pre-Trial Motions Deadline be vacated and reset thirty (30) days.

1 This Stipulation is entered into for the following reasons:

- 2 1. This is the first request for a continuance.
- 3 2. The defendants do not object to the continuance.
- 4 3. Defendants are utilizing the services of Behind the Gavel which has received the
- 5 discovery and begun the implementation of the discovery database, however, it is
- 6 not functional at this time. Defendants and their counsel need additional time to be
- 7 able to access and review the database and be ready for trial.
- 8 4. Several of the parties are involved in plea negotiations and additional time will be
- 9 needed to be ready for trial.
- 10 5. Denial of this request for continuance could result in a miscarriage justice.
- 11 6. The additional time requested by this stipulation is excludable in computing the time
- 12 within which trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States
- 13 Code, Section 3161 (h)(1)(D) and Title 18, United States Code Section 3161 (h)(7)(A) considering
- 14 the factors in Title 18, United States Code, Sections 3161 (h)(7)(B)(I) and 3161 (h)(7)(B)(iv).
- 15 7. For all the above-stated reasons, the ends of justice would best be served by a
- 16 continuance of the current pre-trial motions deadline for thirty (30) days.

17 DATED: January 23, 2018.

18
19 /s/ Cristina Silva
20 CRISTINA SILVA, ESQ.
21 Assistant United States Attorney

/s/ Maysoun Fletcher
MAYSOUN FLETCHER, ESQ.
Attorney for Defendant, Kaleb Louis

22 /s/Russell Marsh
23 RUSSELL MARSH, ESQ.
24 Attorney for Defendant, Trevaughn James

/s/ Kathleen Bliss
KATHLEEN BLISS, ESQ.
Attorney for Defendant, Casey Walters, Jr.

25 /s/Paola Armeni
26 PAOLA ARMENI, ESQ.
27 Attorney for Defendant, Denzel Campbell

/s/ Chris Rasmussen
CHRIS RASMUSSEN, ESQ.
Attorney for Defendant, Maurice Lewis

/s/ Lucas Gaffney
LUCAS GAFFNEY, ESQ.

Attorney for Defendant, Damani Dancy

/s/ Terrence Jackson
TERRENCE JACKSON, ESQ.

Attorney for Defendant, Keenan St. Hillaire

/s/ Joshua Tomsheck
JOSHUA TOMSHECK, ESQ.
Attorney for Defendant, Korregan Washington

/s/ Christopher Oram
CHRISTOPHER ORAM, ESQ.
Attorney for Defendant, Everly James

/s/ Lance Maningo
LANCE MANINGO, ESQ.
Attorney for Defendant, Daniel Wilson

/s/ Gabriel Grasso
GABRIEL L. GRASSO, ESQ.
Attorney for Defendant, Channing Williams

/s/ Telia Williams
TELIA WILLIAMS, ESQ.
Attorney for Defendant, Cody Williams-Jackson

/s/ Jess Marchese
JESS MARCHESE, ESQ.
Attorney for Defendant, Keith Bell

/s/ David Fischer
DAVID FISCHER, ESQ.
Attorney for Defendant, Dominique Washington

/s/ Michael Miceli
MICHAEL MICELI, ESQ.
Attorney for Defendant, Trevionne Williams

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5 Attorney for Defendant,
KALEB LOUIS

6
7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,
Plaintiff,

CASE NO.: 2:17-cr-00180

10 vs.

11 CHANNING WILLIAMS, et. al.
12 Defendants.

13 **FINDINGS OF FACT**

14 Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court
15 finds:

16 This Stipulation is entered into for the following reasons:

- 17 1. This is the first request for a continuance.
- 18 2. The defendants do not object to this continuance.
- 19 3. Defendants are utilizing the services of Behind the Gavel which has received the discovery
20 and begun the implementation of the discovery database, however, it is not functional at this time.
21 Defendants and their counsel need additional time to be able to access and review the database and
22 be ready for trial.
- 23 4. Several of the parties are involved in plea negotiations and additional time will be needed to
24 be ready for trial.
- 25 5. Denial of this request for continuance could result in a miscarriage justice.
- 26
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28

6. The additional time requested by this stipulation is excludable in computing the time within which trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161 (h)(1)(D) and Title 18, United States Code Section 3161 (h)(7)(A) considering the factors in Title 18, United States Code, Sections 3161 (h)(7)(B)(I) and 3161 (h)(7)(B)(iv).

7. For all the above-stated reasons, the ends of justice would best be served by a continuance of the current pre-trial motions deadline.

CONCLUSIONS OF LAW

Denial of this request for continuance would deny the parties herein the opportunity to effectively and thoroughly prepare for trial.

Additionally, denial of this request for continuance could result in a miscarriage of justice.

ORDER

IT IS HEREBY FURTHER ORDERED that the pre-trial motions deadline is extended to February 26, 2018.

IT IS SO ORDERED.

DATED this 25th day of January, 2018.


U.S. DISTRICT JUDGE